

September 26, 2008

Mr. John Kessler Project Manager Attn: Docket No. 07-AFC-8 California Energy Commission 1516 Ninth Street, MS-15 Sacramento, CA 95814-5512

DOCKET

07-AFC-8

DATE

SEP 26 2008

RECD. SEP 29 2008

Subject: Carrizo Energy Solar Farm (07-AFC-8)

Applicant's Responses to Comments from the CEC Workshop Held on

August 5, 2008

URS Project No. 27658060.01800

Dear Mr. Kessler:

On behalf of Ausra CA II, LLC (dba Carrizo Energy, LLC), URS Corporation Americas (URS) hereby submits the Applicant's Responses to Comments from the CEC Workshop Held on August 5, 2008 (Carrizo Energy Solar Farm 07-AFC-8).

I certify under penalty of perjury that the foregoing is true, correct, and complete to the best of my knowledge. I also certify that I am authorized to submit the Applicant's Responses to Comments from the CEC Workshop Held on August 5, 2008 on behalf of Carrizo Energy, LLC.

Sincerely,

URS CORPORATION

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Angela Leiba Project Manager

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		APPLI	CANT'S RESPONSES TO COMMENTS FROM CEC V	WORKSHOP HELD ON	N AUGUST 5, 2008 (CARRIZO ENERGY SOLAR FARM [07-AFC-8])
No.	Speaker	Page/Line	Question	Subject	Response
29	Ms. Gulesserian	page 148, line 20	On the air data request number 2, and response, I think that there is the applicant is double-counting the control efficiency of watering and under-estimating emissions. In data response 2 the applicant assumes a soil moisture content of 50 percent, and it says achieved by watering. And then in data response 3 the applicant assumes a 60 to 70 percent control efficiency due to watering. So, we would think this is double-counting the watering and under-estimating the emissions. So we would want to ask for a revised analysis of those emissions.		Response to CURE Data Request 2 discussed the soil moisture content at the site, which is one factor in calculating dust emissions for construction projects. An estimated soil moisture content of 15% (not 50%), will be maintained in the top layers of soil at the site by the frequent application of water. Response to CURE Data Request 3 also mentioned the application of water and/or dust suppressants to maintain control of fugitive dust emissions, as well as other measures that will be imposed by the CEC as Conditions of Certification to ensure an overall level of dust control that likely will limit offsite visible dust plumes. The percentage effectiveness of these controls is not additive with the percent moisture content in the soil and no double counting of the effects of watering was applied in the analysis of construction emissions.
11	Mr. Strobridge	page 33, line 24	Now, in your report the report states that you're producing hazardous waste once this plant is operating. Is that true or not? So we're on the record, so we can backtrack on this if we ever have to. Is this plant going to generate any hazardous waste?	Hazardous Waste Management	As discussed in Section 5.14.2.2 of the Project AFC, hazardous wastes generated during operation of the Project would include used oils from equipment maintenance, and oil-contaminated materials such as spent oil filters, rags, or other cleanup materials. Table 5.14-3 of the Project AFC summarizes the hazardous wastes to be generated from operation of the plant and includes the waste management methods.
22	Ms. Luckhardt	page 125, line 11	Whether the noise was done near I guess it's wrong Mike Strobridge's new house location and the noise test was done at the location specified near there. So that the noise data is coming from that location. I don't think it was directly Mark, is it on the property or not? Do you remember?Okay, so we're going to have to check that, because there's some concern about whether it was actually done onsite and whether we actually had your permission to be onsite.	Noise	As requested in CEC Data Requests (DR) 82 and 83, the 1-hour ambient sound level measurements at the Strobridge property (APN 072-051-026) were conducted in the morning, in the afternoon, and a night on June 3 and 4, 2008. The latitude and longitude of the measurement location on the southern property line (nearest to the CESF site) was obtained by using global positioning system (GPS). Its coordinate was 35.38842 and -120.04692 (see Attachment 1, Figure 1). The audible noise sources comprising the ambient sound measurement were insects, distant agricultural equipment, distant aircraft, and rustling leaves in the afternoon. During the nighttime, the noise sources were insects and rustling leaves. In the morning, dogs were at the site and barking when a vehicle approached. Other noise sources were distant aircraft and rustling leaves. During the measurements, no agricultural equipment activity or construction activity was observed nearby the measurement location.
					Please see Attachment 1, "Strobridge Sound Level Measurement," which includes a photograph of the measurement location and actual field notes from the three separate, fully-attended measurement periods.

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No.	Speaker	Page/Line	Question	Subject	Response
23	Mr. Strobridge	page 128, line 4	I'd actually like to ask the Energy Commission if they could have URS review my sound test on a weekend when there's no construction crews onsite. And there's either me or a representative of my family there onsite to make sure that everybody's there when they're supposed to be there.	Noise	The ambient sound measurements conducted June 3-4, 2008 already appear to represent the contribution of typical sound sources that, in aggregate, comprise the ambient noise. A repeat measurement, or a measurement at another location on or within the parcel boundary, could be performed. But, after contacting the individual who conducted the test and reviewing the filed notes from the measurement periods, the construction crews were not active during the measurement periods so the tests do not need to be repeated. Similarly, if the construction crews onsite were active and/or in sufficient proximity to the June 3-4, 2008 measurement, URS would have indicated such as a dominant noise source and possibly repeated the measurement as a matter of good acoustical practice.
24	Mr. Kessler	page 132, line 13	At this point some of our initial concerns are with the construction noise impacts. And we are concerned about the impacts to nearby residential receptors. And for duration as long as 35 months. And so we want to look to how that could be mitigated. I know that or we understand that the applicant feels that because of that noise could be temporary that it may not need to be mitigated. But in our view we're looking at some options for proposing conditions of certification which would consist of mitigationAnd we're looking at ways to accomplish that. And to any degree that the applicant can help us brainstorm on that, we'd appreciate it, too.	Noise	Because project construction noise would be temporary, and therefore create what is considered a less than significant impact, CESF believes no mitigation is necessary beyond what has already been presented as six recommended Conditions of Certification (NOISE-2 through -7) appearing in AFC Section 5.12.4.2.
					In addition, the CEC requested the Applicant "brainstorm" on other potential noise mitigation measures. The following are provided as examples of other project mitigation solutions. One could consider practical means of noise control or sound attenuation such as the temporary installation of sound barriers. Portable barriers are available from manufacturers in panel form, to be assembled and erected in the field, or as massive blankets that can be hung from a framing system. Alternately, barriers can be constructed simply from sheets of solid plywood and faced with absorptive material (e.g., glass fiber) on the side facing the construction activity. These barriers could be fixed in place, or made portable so that the screening generally moves with the construction activity or project phase.

		APPLI	CANT'S RESPONSES TO COMMENTS FROM CEC V	WORKSHOP HELD OF	N AUGUST 5, 2008 (CARRIZO ENERGY SOLAR FARM [07-AFC-8])
No.	Speaker	Page/Line	Question	Subject	Response
					Keep in mind that due to the large distances between the CESF site and the noise-sensitive receivers, actual demonstrable noise reduction from the barrier/screen will depend on an interaction of several factors including flanking (both over the top and around the side-ends), wind, temperature and humidity. And of course, at a minimum, a barrier must be solid (not porous or perforated) and provide linear occlusion (i.e., line-of-sight blockage) between the noise source and the receiver but such LOS-blockage does not guarantee noise reduction, in light of the aforementioned flanking and climate factors. The extent of such a barrier, both in terms of height above grade and its uninterrupted length from end to end, will depend on the geographical area of the specific construction activity and noise to be attenuated. Closing the perpendicular distance between the barrier and the noise source is usually favorable, as this should help minimize the end-to-end length.
25	Ms. Holmes	page 139,	Do we have noise estimates for that or not? [referring to Mr. Johnson's comment beginning on line 5: It's proposed there could be some mirror cleaning going on in early morning, late evening hours, but that'll be essentially a silent operation. It's not going to be heavy equipment operating during that.]	Noise	Please refer to Response to CEC DR 104, in which we have associated the mirror cleaning activity with an idling pick-up truck and a portable light-plant.
26	Mr. Bell	page 140, line 11	And the lighting for that operation, how does thathow are you going to get the lights. Do they run on a generator? In other words, you can have portable lights that are small, or you can have something that's run on a generator where you hear putt-puttI'm concerned about the noise and the lights out there.	Noise	Please refer to Response to Question 25, above.
27	Ms. Gulesserian	page 143, line 11	In the Energy Commission's Staff's data requests it points out that the AFC and this question goes to the argument that this project is going to bring a lot of benefits to the local economy because of the money it's going to bring in the AFC says that it's going to provide approximately \$170 million in construction payroll. That's on page 5.10-7. On 5.10-14 it says that it anticipates construction costs to be paid out in wages and salaries of roughly \$55 million. So, the question was what's the difference between construction payroll and wages and salaries.	Socioeconomics	As stated in Response to CEC Data Request 88, "Construction payroll" refers primarily to the wages due to the Applicant's outside construction contractor(s) and associated craftsworkers. The Applicant's operations employees will receive "wages and salaries." These employees will work directly for the Applicant, in most cases. These employees of either Ausra CA I, LLC or Carrizo Energy, LLC, could theoretically oversee the construction process as well, and the term should not be construed as limited to the period beginning only when the construction period ends.

		APPLI	CANT'S RESPONSES TO COMMENTS FROM CEC V	WORKSHOP HELD ON	NAUGUST 5, 2008 (CARRIZO ENERGY SOLAR FARM [07-AFC-8])
No.	Speaker	Page/Line	Question	Subject	Response
28	Ms. Holmes	page 145, line 2	It says, please describe the difference between construction payroll and wages and salaries. And the response that you gave is the construction payroll refers to wages to the applicant's outside construction contractors and associated craft workers. The operation employees receive wage and salaries.	Socioeconomics	As stated in response to CEC Data Request 88, "Construction payroll" refers primarily to the wages due to the Applicant's outside construction contractor(s) and associated craftsworkers. The Applicant's operations employees will receive "wages and salaries." These employees will work directly for the Applicant, in most cases. These employees of either Ausra CA I, LLC or Carrizo Energy, LLC, could theoretically oversee the construction process as well, and the term should not be construed as limited to the period beginning only when the construction period ends.
1	Officer Hester	page 18, line 1	How much truck traffic do you expect that would be permitted loads to travel on a daily basis or a weekly basis? Meaning exceeding those limits of 65 foot overall length. Or a kingpin setting that exceeds 30 feet.	Traffic	Please refer to Attachment 2 for the Response to Question 1.
2	Officer Hester	page 19, line 7	And how many – because we're representing Kern, we'll be on the Kern County side for enforcement. Will that be coming from the San Luis side or the Kern County side? Or is it 50/50?	Traffic	Please refer to Response to Question 1, above.
3	Officer Hester	page 19, line 17	And out of those 36 loads, are those all permitted loads that are going to be escorted with pilot cars and CHP Officers?	Traffic	Please refer to Response to Question 1, above.
4	Ms. Bell	page 20, line 16	And I'm looking at your table 2.11-1. So, it says that your average is 52 buses a day, six equipment deliveries. Equipment deliveries, are those trucks?	Traffic	Please refer to Response to Question 1, above.
5	Ms. Bell	page 21, line 2	And then there's 36 construction trucks and 12 onsite manufacturing. So those are trucks, right?	Traffic	Please refer to Response to Question 1, above.
6	Ms. Bell	page 21, line 6	So it's a total of your average daily trips are 106, right?	Traffic	Please refer to Response to Question 1, above.
7	Ms. Bell	page 21, line 9	Those are all large vehicles. And then it peaks at 188 per day. Now, if a large portion of these are on highway 58 with pilot cars, obviously there's going to be delays.	Traffic	Please refer to Response to Question 1, above.

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No.	Speaker	Page/Line	Question	Subject	Response
8	Ms. Bell	page 21, line 13	And I'd like to know what kind of delays that people that use 58 to get to work can expect. It sounds like that would shut down 58 for a majority of the time.	Traffic	A typical vehicle traveling at an average speed of 45 mph westbound on SR-58 from SR 33 to the project site can negotiate the 31 mile segment in approximate 41 minutes. A pilot car and CHP escorted vehicle traveling at an average speed of 25 mph can negotiate the same segment in approximately one hour and 12 minutes. Based on the above speed and distance assumptions, non project related vehicles on average could potentially get delayed approximately 31 minutes assuming they are following a pilot car or escorted project related truck without the opportunity of passing.
9	Mr. Strobridge	page 28, line 18	Are those hazardous waste trucks going to be handled safely with pilot cars? Are they going to be on the road the same time as our school buses are on the road? You know, how many what size of trucks? How many, you know, what's the safeguard on the part of the Highway Patrol? How are you going to insure that the community is safe with hazardous waste rolling up and down the highway?	Traffic	There will be no acutely hazardous materials that will be used or generated as waste at the project site. The only hazardous material used during construction will be small quantities of adhesive prep and adhesive used during construction. In additional, small quantities of non-hazardous wastes such as soiled rags, oils, lubricants will also be generated. All wastes will be collected and transported in sealed drums/containers and disposed of in licensed facilities in accordance with standard practices and regulations. No pilot/escort cars are used in transport of these materials.
10	Mr. Ricks	page 32, line 5	Unfortunately, Caltrans couldn't be here, but recently they did have a meeting with the applicant, with Ausra, where they asked Ausra to analyze which curves in the road on state route 58 would be particularly troublesome or to cause off-tracking where a truck would cross the centerline and present a hazard to oncoming traffic. And I'm not sure what the status of that analysis is. But that's what was requested by Caltrans.	Traffic	The Applicant and URS have been working with Caltrans to identify potential "off-tracking" areas surrounding the project site. Thus far, URS has identified 12 "off-tracking" truck routes coming from west and east SR-58 (see attached Figure). The Applicant, URS and Caltrans will continue to move forward on how to address these areas to ensure safety of all travelers along these affected portions of the roadways.
12	Mr. Young	page 37, line 6	Are we going to have trucks with pilot cars every day on this construction? Is that am I correct on that?	Traffic	Please refer to Response to Question 1, above.
13	Mr. Young	page 37, line 14	And are all these pilot cars driven by CHP Officers?	Traffic	Caltrans regulates if a pilot/escort car or CHP escort are needed. This is determined by vehicle width (as shown below). Pilot/escort vehicles and CHP escorts are separate.
					Caltrans Pilot Car Requirements
					Route >10'0" to >11'0" to >12'0" to >13'0" to >14'0" to >15'0" to >16'0"
					11'0" 12'0" 13'0" 14'0" 15'0" 16'0" 16'0"
					Pilot Car Legend, Single Trip Permits Pilot Car Maps, Caltrans. 2008.

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No.	Speaker	Page/Line	Question	Subject	Response
14	Mr. McGibney	page 39, line 1	When would you be coming up 58 as opposed to taking 46 to Bitterwater? And then, also, if you're coming down 101 where would you then enter 58 from? Would you be going through Paso Robles? And if so, how would you do that?	Traffic	Please refer to Response to Question 1, above.
15	Mr. McMillan	page 40, line 3	How was Bitterwater chosen over 58? There's a number of ways to get if you're coming from Paso Robles the fastest way to get here is to come out Crestin Road where all 58 come over. Going out Bitterwater is a long way around. Why was that chosen at all, being such a bad road?	Traffic	As mentioned in Response to Question 1, above, the Applicant foresees using SR-58 for all truck trips from both the East and West to access the site; SR-46/Bitterwater Road will only be used for limited truck trips, if required.
30	Ms. Bell	page 162, line 25	And I had asked that question quite awhile back, what determined who is a sensitive receiver, and not, what are the guidelines. You know, how do you pick who gets to have a good view and who doesn't.	Visual Resources	Residences with "Foreground Views" (or residences within 0 to 0.5 mile from the Project) are considered to have the highest level of Project visibility, as the viewer is adjacent to the Project site and is a permanent stationary viewer. The farther the residence is from the Project, the less impacted their view becomes. When analyzing potential visual impacts, Key Observation Points (KOPs), or viewing locations are chosen to be representative of the most visually sensitive areas that would view the Project. The closest residence, or the residence with the most direct and unscreened view to the Project, is generally chosen to be representative of the "worst case" impact for residential views surrounding the Project site. This is not to say that no other residences views would be affected; it is simply used as a basis to determine the highest level of visual impact from a Project.
16	Mr. Lindley	page 89, line 2	The applicant provided an estimate of between 162 and 208 acrefeet per year of runoff discharge from the site. I think that estimate is based on a runoff coefficient of about .38, .4 applied to the typical annua rainfall that we receive, or the Carrisa Plain receives. I think that estimate is likely to be an over-estimate of the amount of runoff that we would expect at the siteSo, it's one thing that I'd like the applicant to consider, instead of applying an event-based runoff coefficient to the entire rainfall you get over the entire year, applying that runoff I should say maybe looking at more individual events in trying to figure out how much runoff you would get in your typical year under the site under existing conditions. To try and get a better feel for the amount of increased percolation that we could expect from the site design.	Water Resources	The Applicant's response is included within the Revised Hydrology/Hydrogeological Report. Specifically, refer to Section 2.2.3.

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17	Mr. Lindley	page 94, line 22	So, I've asked the applicant, in a series of data requests, to revise or supplement their report and address a few of my concerns. So, one concern is, that I actually didn't get into detail with the data request, would be to take a look at their computation for average annual runoff from the project site. And then I think a key part of this is trying to figure out, okay, say there's 20 acrefeet of runoff from the project site. If they capture that, how much are they going to lose to evaporation versus how much are they going to be able to percolate inside of their, you know, their individual drainage cells, if you will.	Water Resources	The Applicant's response is included within the Revised Hydrology/Hydrogeology Report. Specifically, refer to Section 2.2.3.4.
18	Mr. Lindley	page 94, line 11	Then another concern that I do have, when I look at the groundwater modeling they did, which I thought was a really great way to look at potential impacts, but I had a couple concerns with the amount of pumping that was assigned to the local users here. I noticed that you guys had, at least in the writeup, you had identified 12 gpm as a constant pumping rate for the wells that didn't have a known pumping rate as your assumption. And then you looked at other wells pumping on a 35 percent duty cycle. And, you know, I just get the feeling that that's over-estimating the amount of water that most of the wells in the Carrisa Plain are drawing from the aquifer. You know, 12 gpm is about what the project's going to draw. And I think most of the users in this room are, you know, relatively small users; probably drawing on the order of a half ar acrefoot to an acrefoot per year.	Water Resources	The Applicant's response is included within the Revised Hydrology/Hydrogeology Report. Specifically, refer to Section 3.6.2.3.
19	Mr. Lindley	page 97, line 1	Try and get a better feeling for the amount of runoff that leaves the site under the current conditions, and how well that offsets the water use on the site.	Water Resources	The Applicant's response is included within the Revised Hydrology/Hydrogeology Report. Specifically, refer to Section 2.2.3.
20	Mr. Lindley	page 97, line 9	I'd like to get some more detail on that perimeter swale just to try and make sure that we're not actually capturing and infiltrating all of the runoff from the whole 8.2 acres upstream of the site.	Water Resources	The Applicant's response is included within the Revised Hydrology/Hydrogeology Report. Specifically, refer to Section 2.2.3.3.

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No.	Speaker	Page/Line	Question	Subject	Response
21	Ms. Gulesserian	page 101, line 23	Something else that we would want to see in revising the modeling would be to calibrate the model. And we saw that there was reference to core sand calibration, but we think that there is basis for doing more of a technical calibration under USEPA guidance. And so if you could incorporate that in revised report, that would be great.	Water Resources	The Applicant's response is included within the Revised Hydrology/Hydrogeology Report. Specifically, refer to Sections 3.6.3.1 and 3.6.3.4.

Strobridge Sound Level Measurement

As requested on Data Requests (DR) 82 and 83, the sound level measurements at the Strobridge property (APN 072-051-026) were conducted in the morning, in the afternoon and at night on June 3 and 4, 2008. The latitude and longitude at the measurement location was obtained by using global positioning system (GPS). Its coordinate was 35.388428 and -120.046928. Figure 1 shows the measurement location.

Figure 1: Strobridge Sound Level Measurement Location



The 1-hour ambient noise measurements were conducted on June 3 and 4, 2008 in the morning, in the afternoon, and at night at the southern property line (nearest to the project site) of APN 072-051-026 (Strobridge)

The noise sources at APN072-051-026 (Strobridge) were insects, distant agricultural equipment, distant aircraft, and rustling leaves in the afternoon. During the nighttime, the noise sources were insects and rustling leaves. In the morning, dogs were at the site and barking when a vehicle approached. Other noise sources were distant aircraft and rustling leaves. During the measurements, no agricultural equipment activity was observed nearby the measurement location. Figure 2 shows the photo at the site.

Figure 2: Photo at Strobridge (Facing North)



The weather condition was calm and without precipitation throughout the measurements at the Strobridge site. Table 1 presents the results of sound level measurements.

Table 1: Sound Level Measurement Results at APN072-051-026 (Strobridge)

Date	Start Time	End Time	L _{eq}	L ₁₀	L ₅₀	L ₉₀	Wind (mph)	Temp. (F8)	Humidity (%)
6-3-08	15:15	16:15	41.6	43.8	40.6	35.9	Calm	86	24
6-4-08	0:30	1:30	45.9	49.8	43.0	35.4	Calm	65	57
6-4-08	8:50	9:50	45.9	45.8	41.3	39.6	Calm	62	54

Attachments A, B, and C are the field notes for the afternoon, night, and morning measurements, respectively.

Attachment A: Field Note for the Afternoon Measurement

FIELD NOISE MEASUREMENT DATA

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Serial #	1528	(Red).	Serial		2233							
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Respons			mpl	Post-T	est:	94-1	dBA S	SPL	Topo):		Hilly (desc	cribe)
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Attachment B: Field Note for the Night Measurement

FIELD NOISE MEASUREMENT DATA

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	screen:			**************************************					Wind			dy / Gusty		
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	35				49.6		32.8					-		
	80		4912	31.6	56.1	54,2	36.4							
	45		46.9	33.4	56.0		47.7	34.9						
	50		46.5	33.5			45.3	43.8						
	55		45.1	27.9	56.4	48.5	33,9	30.7						
	1:00		42.8	31-1	47.8	46.7	35.4	33.5						
	05		43.7	28-4		47.8	32.8	30.3						
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	Other Noi	se Sources:	distant: a	ircraft / ro			/ landscap			/ childre	en playing	dogs ba	arking / birds vo	calizing

Attachment C: Field Note for the Morning Measurement

FIELD NOISE MEASUREMENT DATA

Proje Proje	ct Name	<u>:</u>		9	Dov	/ Date:	6/1	,			Mus	lame:	Page	of
roje		d 1 aa.l			Day				est or	_	IVIY IN	lame:		
		d Level	and the same of the same of				alibrat			l		vveat	her Meter	
Mode		n820	1990 00		Model # <i>CAC 150</i> Serial # 2233						el#		Serial #	
Serial			Rod				227			_				
		A/C/			Pre-Te		94.2.			Terra			/ Soft / Mi	
	onse: screen:	Slow / I Yes / N		mpl	Post-1	est:	93.8	dBA S	SPL	Topo			Hilly (deso ty / Gusty	cribe)
ID	Time Start	Time Stop	Leq	Lmin	Lmax	L10	L50	L90	Wind Dir (r		Temp (°F)	RH (%)	Bar Psr (in Hg)	Cloud Cover (%)
	8:50		43.9	36.2	51.9	47. 2	41.6	37.6	_	_	62	5-4	28.01	20
	55		48.0	45.3	53.2	49.8	47.6	46.1			0	/		
	9:00		54.8	44.3	75.8	52.0	46.0	44.6						
	05		46.9	44.5	49.8	48.4	46.8	45.3						
	10			21.7		49.0	3012	23.0						
	15			20.4			26.6	27.0						
- 118	w			20.4		24,5	22,2							
	25		22.5		31-6	23.8	22.2	21.1						
	30		25.5	20.8	34.5	28.5	24.1	21.6		VIDASA -				
	35		23.0	2016	26.9	24.8	22.6	21.3		60	0000	3 100.80		ALLEN SINGE
F	Roadway	y Name							,	Loc	ation(s) / GP	S Reading	ı(s):
				23.1			544			N	ORT	H		
	peed (pour umber o		KS.	23.1	20.8	25.25	244	21.8	21.1		1000 1110-1001			
	/idth (pa		_		_				1 00	102	Car			
VV		2- way							1 D	06				
	1- 01	Grade				54			1	00				
	Bu	s Stops												
		oplights				-								
		Parking	_			-		-						
		mobiles				-		- 10						
	Medium				51100	-								
		Trucks							1					
	Hoavy	Trucko												
	Other Nois	se Sources:	distant: a	ircraft / ros	idway traff	ic / trains	/ landscap	ing / fustli	ng leaves	/ childre	n playing /	dogs ba	rking / birds vo	calizing

Several questions were raised about peak and daily construction traffic numbers, referencing Table 2.11-1 in the Supplement to the AFC, dated July 2008. The table has been included below for easy reference. In addition, URS has reviewed traffic routes associated with the Project and foresees using SR-58 for all truck trips from both the East and West to access the site; SR-46/Bitterwater Road will only be used for limited truck trips, if required. Bus trips may use other routes including, but not limited to, Bitterwater Road, La Panza Road, and/or Creston Road to access SR-58 and the Project site.

Table 2.11-1
Peak Construction Trip Generation

	Pe i	er ge	Pe or ri		P Pe or ri		
	ri	i ri		t			t
Peak CESF Construction (Workers) Buses	84	52	21	21		21	21
Equipment Deliveries	14	6	4	4		0	3
Construction Trucks	75	36	5	5		0	5
Onsite Manufacturing	15	12	2	2		1	2
ot ri Per Pe o r							

See below for a descriptive breakdown of the average daily and peak daily construction trips from Table 2.11-1 above.

Average Daily Trips:

CA legal reflector parts truck trips requiring CHP escort* from Kern County: 2

CA legal oversized truck trips requiring CHP escort* from San Luis Obispo County: 1

SR-58 legal truck trips requiring 1 pilot/escort car and flaggers from Kern County: 7

SR-58 legal truck trips requiring 1 pilot/escort car and flaggers from San Luis Obispo County: 2

CA legal truck trips requiring 2 pilot/escort cars and flaggers from Kern County: 2

53' long CA legal truck trips with decking and maximum weight requiring 2 pilot/escort cars and flaggers from San Luis Obispo County: 2

Permitted miscellaneous delivery truck trips (not requiring flaggers or pilot/escort cars): 38

Buses: 52

TOTAL: 106

^{*}Trucks exceeding 38-foot kingpin to rear axel or are > 15-feet in width.

Peak Daily Trips:

CA legal reflector parts truck trips requiring CHP escort* on SR-58 from Kern County: 5

CA legal oversized truck trips requiring CHP escort* from San Luis Obispo County: 2

SR-58 legal truck trips requiring 1 pilot/escort car and flaggers from Kern County: 9

SR-58 legal truck trips requiring 1 pilot/escort car and flaggers from San Luis Obispo County: 4

CA legal truck trips requiring 2 pilot/escort cars and flaggers from Kern County: 4

53' long CA legal truck trips with decking and maximum weight requiring 2 pilot/escort cars and flaggers from San Luis Obispo County: 2

Permitted miscellaneous delivery truck trips (not requiring flaggers or pilot/escort cars): 78

Buses: 84

TOTAL: 188

Note 1: All equipment deliveries are assumed to be "truck trips." In addition, half of the equipment deliveries are assumed to require CHP escorts, the other half is assumed to require pilot/escort cars. This is a "worst-case" estimate, since likely many of these trips will be in permitted trucks not requiring CHP nor pilot/escort cars or flaggers.

Note 2: The 17 average daily/25 peak daily pilot/escort cars were not included in the original AFC or in the Supplement to the AFC. However, because the number of pilot/escort trips associated with the Project is far below the threshold to affect the current Level of Service (LOS) for the affected Project roadways, no changes to the original or supplemental analyses are required. LOS for all roadways remain unchanged.

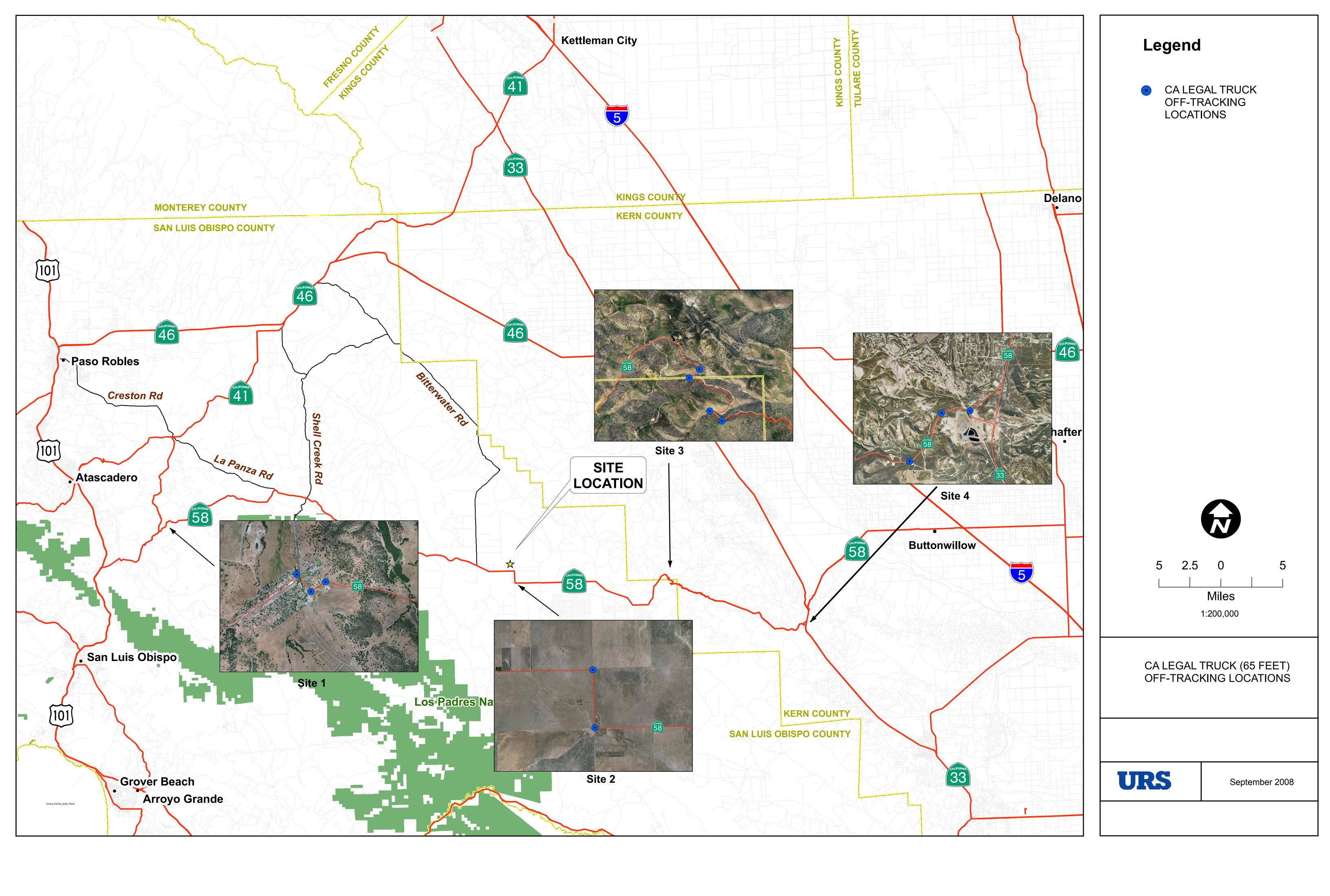
Note 3: Caltrans regulates if a pilot/escort car or CHP escort are needed. This is determined by vehicle width (as shown below). Pilot/escort vehicles and CHP escorts are separate.

Caltrans Pilot Car Requirements

Route	>10'0" to 11'0"	>11'0" to 12'0"	>12'0" to 13'0"	>13'0" to 14'0"	>14'0" to 15'0"	>15'0" to 16'0"	>16'0"
SR-58	1 Pilot Car	1 Pilot Car	2 Pilot Cars	2 Pilot Cars	2 Pilot Cars	CHP	CHP

Pilot Car Legend, Single Trip Permits Pilot Car Maps, Caltrans. 2008.

^{*}Trucks exceeding 38-foot kingpin to rear axel or are > 15-feet in width.



BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION For the CARRIZO ENERGY
SOLAR FARM PROJECT

Docket No. 07-AFC-8

PROOF OF SERVICE

(Revised 7/24/2008)

INSTRUCTIONS: All parties shall either (1) send an original signed document plus 12 copies or (2) mail one original signed copy AND e-mail the document to the address for the Docket as shown below, AND (3) all parties shall also send a printed or electronic copy of the document, which includes a proof of service declaration to each of the individuals on the proof of service list shown below:

*CALIFORNIA ENERGY COMMISSION Attn: Docket No. 07-AFC-8 1516 Ninth Street, MS-15 Sacramento, CA 95814-5512 docket@energy.state.ca.us

APPLICANT

Perry H. Fontana, QEP Vice President-Projects Ausra, Inc. 2585 East Bayshore Road Palo Alto, California 94303 perry@ausra.com

APPLICANT CONSULTANT

Angela Leiba, GISP
Senior Project Manager
GIS Manager/Visual Resource
Specialist
URS Corporation
1615 Murray Canyon Road, Suite 1000
San Diego, CA 92108
angela leiba@urscorp.com

Kristen E. Walker, J.D.
URS Corporation
1615 Murray Canyon Road, Suite 1000
San Diego, California 92108
kristen e walker@urscorp.com

COUNSEL FOR APPLICANT

Jane Luckhardt, Esq.
Downey Brand Law Firm
555 Capitol Mall, 10th Floor
Sacramento, CA 95814
jluckhardt@downeybrand.com

INTERESTED AGENCIES

*California ISO P.O. Box 639014 Folsom, CA 95763-9014 e-recipient@casio.com

<u>INTERVENORS</u>

California Unions for Reliable Energy (CURE) c/o Tanya Gulesserian Adams Broadwell Joseph & Cardozo 601 Gateway Boulevard, Suite 1000 South San Francisco, CA 94080 tgulesserian@adamsbroadwell.com

ENERGY COMMISSION

Jackalyne Pfannenstiel Chairman and Presiding Member jpfannen@energy.state.ca.us

Jeffrey D. Byron Commissioner and Associate Member jbyron@energy.state.ca.us

Gary Fay Hearing Officer gfay@energy.state.ca.us

* John Kessler
Project Manager
Jkessler@energy.state.ca.us

Caryn Holmes Staff Counsel cholmes@energy.state.ca.us

Michael Doughton Staff Counsel mdoughto@energy.state.ca.us

Public Adviser's Office pao@energy.state.ca.us

DECLARATION OF SERVICE

I, Kristen E. Walker, declare that on September 26, 2008, I deposited copies of the attached <u>Applicant's Responses to Comments from the CE</u>C Workshop Held on August 5, 2008 in the United States mail at with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

I declare under penalty of perjury that the foregoing is true and correct.